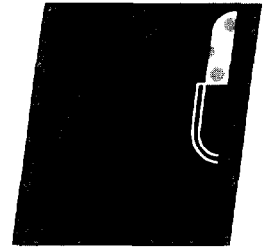


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D.E. Wright
President

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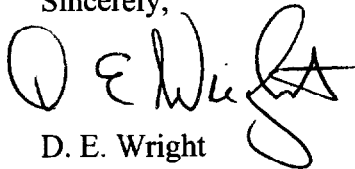
FCC MAIL ROOM

May 18, 1999

Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S. W.
Washington, D. C. 20554

Enclosed please find ten (10) copies (an original plus four copies and one copy for each of the commissioners) of Formal Comments by Duey Edward Wright relating to MM Docket No. 99-25.

Sincerely,


D. E. Wright

DEW/cjk

enc.

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List ABCDE

Midwest Communications, Inc.
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920-435-3771 Fax: 920-455-1155

WRIG WSAU WDEZ WIFC WOFM WIZD

WGEE WIXX WOZZ WLTM WROE WNCY WNFL

WNWN-FM WTVB WFAT WNWN-AM

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

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In the Matter of

Creation of a Low
Power Radio Service

MM Docket No. 99-25

RM-9208

RM-9242

Comments of

Duey Edward Wright, President

MIDWEST COMMUNICATIONS, INC. (WGEE, WIXX, WLTM,
WOZZ, WNCY, WROE, WNFL, WFAT, WNWN, WNWN-FM,
WTVB)

WRIG, Inc. (WRIG, WDEZ, WSAU, WIFC, WOFM, WIZD)

May 10, 1999

Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S. W.
Washington, D. C. 20554

Re: Creation of a Low Power Radio Service
MM Docket No. 99-25
RM-9208
RM-9242

My name is Duey Edward Wright and I have been in the broadcasting business for over 40 years. In 1958, when I was 18 years old, our family became involved in broadcasting with the purchase of a class IV AM operating with 250 watts on 1400 KHZ in Wausau, Wisconsin. There were five other stations in Wisconsin on 1400 KHZ and I soon learned what destructive interference can do. At night our little station barely made it to the city limits! But I loved radio and I determined that one day we would have a regional coverage station. As AM was still "king" in the late fifties our first plan was to seek a frequency change and power increase on the AM band. However with AM allocations a mess and an application "freeze" or two thrown in, we were unable to do anything with our AM other than go to 1000 watts during daytime hours with all the rest of the class IVs. This didn't do a whole lot of good as mutual interference increased as well. With the introduction of stereo FM in the very early 1960s we thought that maybe FM would be the answer.

May 10, 1999
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Just about this time the FCC issued a docket setting up the class A, B, C and D FM standards and setting up a new table of allocations as well. I remember carefully reading through the docket and noting comments in the docket stating that strict mileage separations were necessary so that the FM service would not suffer the severe interference problems that plagued AM radio. I thought this is exactly what is needed to get the FM service going and we applied for and were granted a class C station on 101.9 MHZ in Wausau, Wisconsin. That station (WRIG-FM, now WDEZ) gave us the regional coverage without interference that we needed to allow us to be competitive and is still owned and operated by the original licensee, WRIG, Inc.

Interference protection to stations in the FM service was compromised a bit with the adoption of Docket 80-90 in the 1980s. Although huge technical problems did not occur, the economic effects on radio as a business were enormous. The proliferation of new stations particularly in smaller markets had a devastating effect on radio profit and loss statements. There were many cities in our area of operations, the Midwest, that became so overcrowded with new allocations and move-ins, that profits for most stations disappeared altogether. Many stations were forced to curtail news coverage and community service functions simply because there was no money to fund them.

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A few examples of markets that became overcrowded with allocations from Docket 80-90 include La Crosse and Eau Claire, Wisconsin; Fargo, North Dakota and Lincoln, Nebraska. We personally witnessed the situation in Lincoln, Nebraska when we acquired KLMS and KFMQ in the late 1980s.

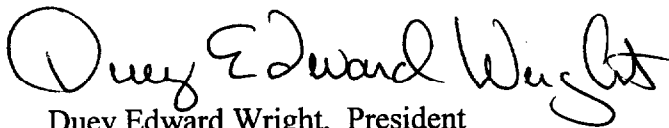
In the 1990s, legislation and FCC rules changes allowed consolidation that today has made radio a healthy medium and has benefited listeners with a wider variety of format choices than ever before. However, now a new real threat to radio as a viable enterprise is on the horizon---Low power and Micro-radio. My major concern is with the technical aspects of the proposal that would eliminate 2nd and 3rd adjacent channel protection. Over the years I have witnessed a proliferation of translators come on the air and have seen what they can do to FM coverage. As an example, we have a class C station in Green Bay, Wisconsin (WIXX) operating on 101.1 MHz with 100 KW at 1080 feet AAT. Recently a 3rd adjacent translator (101.7 MHz) came on the air at Fond du Lac, Wisconsin within our 1 MV/M contour. We have received a number of complaints from listeners in Fond du Lac about the translator causing interference to the reception of WIXX. As I understand it, the proposal being considered would allow 2nd and 3rd adjacent operations anywhere within primary and secondary coverage contours of full power stations.

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With the majority (80-90%) of receivers in the hands of consumers today, devastating interference in the proximity of these proposed transmitters would occur. And as these transmitters would most probably be located in areas of dense population, significant loss of primary listeners to full power stations would occur. And this is just the tip of the iceberg. It appears that the proposed new in-band-on-channel digital service could suffer potentially devastating interference as well.

The current FM allocation scheme has filled the FM band to its practical limit. With over 700 allocations still unused (2 in the Green Bay area) one has to wonder about the overall need for more stations at the great expense of destroying the integrity of the FM service as it exists today. Please don't turn the FM band into the mess that exists on the AM band. Allow current FM broadcasters to continue to adequately serve listeners in the primary and secondary areas they were licensed to cover and give in-band-on-channel digital FM broadcasting a chance to succeed.

Respectfully submitted by:

A handwritten signature in black ink, reading "Duey Edward Wright". The signature is written in a cursive, flowing style. The first letter "D" is large and loops around the first part of the name. The last name "Wright" is also written in a cursive style with a large "W".

Duey Edward Wright, President
WRIG, Inc., Midwest Communications, Inc.
115 South Jefferson Street
Green Bay, Wisconsin 54301